

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

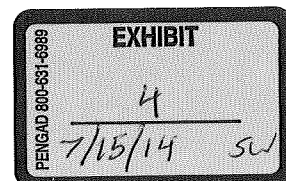
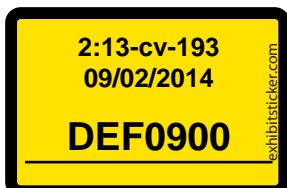
Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

DECLARATION OF THE SOCIAL SECURITY ADMINISTRATION

Pursuant to the parties' stipulation, the United States Social Security Administration ("SSA") provides the following declaration pursuant to 28 U.S.C. § 1746, in lieu of oral testimony regarding topic 3, as set forth in "Defendants' Second Amended Notice of Intention to Take Oral Deposition of the United States Social Security Administration," served on July 14, 2014, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure:

As discussed in the May 29, 2014, declaration of Steve Strausler, SSA attempted to match particular combinations of identifying information for Texas registered voters (*e.g.*, first and last name, gender, and date of birth) with the same or related combinations of identifying information with respect to records from SSA's master beneficiary records of persons who are 18 years of age or older, and who SSA has determined to be in current payment status for disability. SSA's Master Beneficiary Records include records from the following SSA systems of records: (1) Master Beneficiary Record, System of Record Notice 60-0090 (last published at 71 F.R. 1826 (January 11, 2006)) (hereinafter "MBR") and (2) Supplemental Security Income Record and



Special Veterans Benefits, System of Record Notice 60-0103 (last published at 71 F.R. 1830 (January 11, 2006)) (hereinafter “SSR”).

Updates to the MBR:

The fields on the MBR that were matched in the algorithms requested by the Plaintiffs and Texas in this case are maintained/updated on a daily basis (Monday through Friday, with the exception of federal holidays). The update is based on the receipt of transactions from a myriad of sources but largely from SSA Field Offices, Teleservice Centers, Program Service Centers, and Internet transactions received directly from the beneficiary. Address data is also received from the National Change Of Address process, monitored by the United States Postal Service, and updated four times a year. Additional information on the National Change of Address Processing can be found in SSA’s Program Operations Manual System (POMS) § GN 02605.046, available at www.ssa.gov.

Updates to the SSR:

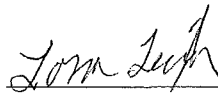
The fields on the SSR that were matched in the algorithms requested by the Plaintiffs and Texas in this case are maintained/updated on a daily basis (Monday through Friday, with the exception of federal holidays). The update is based on transactions by SSA field office employees and State Disability Determination Services (DDS) staff, as new information becomes available. Based on information submitted by SSA and DDS staff, the system is programmed to determine whether individuals are currently eligible for benefits (e.g., too much income, excess resources). SSA’s relationship with the DDSs are defined by SSA regulations. *See, e.g.*, 20 C.F.R. Parts 404 and 416, Subparts J.

We hereby declare under penalty of perjury that the foregoing is true and correct to the best of our knowledge, information, and belief.

This 15th day of July, 2014.



Steve Strausler
Computer Specialist
Social Security Administration



Lorna Leigh
Senior Systems Advisor
Social Security Administration